Indiana Department of Natural Resources Division of Forestry State Forest Resource Management Guide Public Comment Summary

## **SUMMARY COMMENTS**

The table below is a summary of public comments received concerning the draft Resource Management Guide. The public comments received have been reviewed in their entirety and given due consideration summarized in the Division of Forestry response below.

## **Comment Summary**

- Concern of potential impact to Indiana and Northern long eared bat and RTE species. Recommends detailed environmental inventory of birds, wildlife and plants be conducted/included in DMG. Concern on reliability of the NHDB.
- Concern on impacts to soil and water resources and effective implementation and monitoring of BMPs. Suggests steepest slopes be avoided. Specific BMPs to be used are not mentioned in the RMG.
- Commenter would like more details than provided in the guide as it relates to wildlife and timber inventories and assessments.
- Concern on current level of harvesting on the State Forest.
- Questions importance of and need for early successional habitat. Suggests tract be managed for interior forest habitat
- Concern the prescribed management may lead to less genetically diverse and less resilient forest ecosystems
- Concerned about terminology used to describe trees and forest conditions and that full range of values are not considered. Concern about utilitarian (tree farm) management philosophy.
- Concern on potential introduction and spread of invasive species as result of management activity.
- Would like longer comment period to be longer than 30 days.
- Concern on impacts to recreational use of the tract.
- Concern RMG does not address impacts on climate change

## **Division of Forestry Response**

- The 30 day public comment period will remain as standard procedure. However, if individuals have information that is pertinent and specific to the tract they can present that information at anytime. (e.g. Cemetery information)
- Recreational use of the area is low. The proposed management will temporarily impact recreational use of the area, during which the area will be closed to public access for safety reasons.
- Habitats, communities and species are considered as part of the management planning process. Along with field observations, Natural heritage data has been reviewed to check for threatened or endangered bird and wildlife species on or near the management unit. Concerns also addressed in the DoF Environmental Assessment. All DNR lands contribute to providing a diversity of habitats across the landscape.
- Implementation of the RMG will utilize guidance from the US Fish and Wildlife Service and other sources to avoid take impacts to the Indiana and other Listed bat species.
- Best management practices will be implemented and monitored to address the soil erosion and sedimentation concerns. BMPs will be required of operator and included in timber sales contracts.
  DoF will respond to reported BMP departures.
- The BMP guidebook can be found at www.in.gov/dnr/forestry/2871.htm
- The management guide provides an overview of wildlife and

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and carbon sequestration. Suggests DoF put in place evaluation standards to consider the cumulative impacts of all state and federal forest management projects across the state.

- Opposes the harvest prescription within the RMG citing general concerns on impacts to climate change, environmental pollution, wildlife, forest succession, fragmentation, and diversity.
- Questions management techniques to promote Oak and other species and why oak or hickory are preferred species.

- timber resources rather than full data and details utilized for guide development and implementation. Timber inventory and wildlife data/assessments are available.
- Timber harvest levels on State Forests are currently set at a level where tree growth greatly exceeds removals. These levels are periodically reviewed as new inventory data is collected. See <a href="https://www.in.gov/dnr/forestry/files/fo-state-forest-cfl">www.in.gov/dnr/forestry/files/fo-state-forest-cfl</a> Report 2010 2014.pdf
- The RMG uses forest terminology which integrates many considerations including biological, human utility and more. The scope of considerations is not always fully portrayed by the terminology.
- Invasive species presence, management and control are incorporated in the RMG.
- Fragmentation concerns in this area is agricultural and residential development (permanent fragmentation). The prescribed regeneration openings are temporary in nature, provide habitat diversity benefits and not considered habitat fragmentation in the context presented.
- Further information on direct and indirect impacts on species and habitats are found in the Indiana State Forest Environmental Assessment. HEE research can be found at <a href="http://heeforeststudy.org/">http://heeforeststudy.org/</a>
- See the Indiana State Forest Environmental Assessment for discussion on the importance of Oak-Hickory forest and their management
  - http://www.in.gov/dnr/forestry/files/fo-StateForests\_EA.pdf
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- The prescribed management activities are consistent with silvicultural principles, promotes habitat diversity and supported

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,	by inventory data and field assessments. The concerns expressed
	have been considered and may be further addressed during plan
	implementation.

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